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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

JONATHAN DEAN IVAN MUNOZ,)	Case No.: 1:23-cv-00385-BAM
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	FOR AN EXTENSION OF TIME
)	
vs.)	
KILOLO KIJAKAZI,)	
Acting Commissioner of Social Security,)	
)	
Defendant.)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Complaint be extended from May 14, 2023, up to and including June 13, 2023. This is the Defendant's first request for an extension. Defendant requests this extension because Defendant has been notified that a certified administrative transcript (CAR) is not yet available in this case. Defendant therefore cannot respond to Plaintiff's Complaint. Once the CAR arrives, Defendant will need to review it for defects before submitting it. For these reasons, Defendant

1 asks the Court to approve this unopposed motion and extend the deadline to file a response to
2 Plaintiff's Complaint. Plaintiff does not oppose Defendant's request for an extension of time.
3 The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.
4

5 Respectfully submitted,

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7 Dated: May 4, 2023

/s/ Francesco Paulo Benavides*
(*as authorized via e-mail on May 1, 2023)
Jonathan Omar Pena
Attorney for Plaintiff

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9
10 Dated: May 4, 2023

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13 By: /s/ Heidi L. Triesch
14 Heidi L. Triesch
15 Special Assistant U.S. Attorney
16 Attorneys for Defendant

17 **ORDER**

18 Pursuant to the parties' stipulation, and good cause appearing, IT IS HEREBY
19 ORDERED that Defendant shall have an extension, up to and including June 13, 2023, to
20 respond to Plaintiff's Complaint.
21 IT IS SO ORDERED.

22
23 Dated: May 8, 2023

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE